

## **Examples of issues with Qwest rates billed on the July 25<sup>th</sup> dated invoices to Eschelon:**

Eschelon has already discussed the UNE-P bills its receives from Qwest in its initial Comments filed in July. Many of the issues reflected below are also relevant to Eschelon's UNE-P invoices.

### **1. UNE Loop Bills - Monthly Recurring Charges (monserv.det file)**

Overcharged %: 7.0%

Issues:

- a. Qwest implemented some of the new rates ordered in the most recent cost docket for unbundled loop rates. However, there are occurrences where the DS1 capable loop rates on some circuits are still being billed at the old rate. Also, Qwest is billing an inaccurate charge for interconnection tie pairs (ITP). Also, on the bill, the charge is shown as an EICT--not consistent with the SGAT rate element description.
- b. Qwest bills for USOCs not appropriate for unbundled loops, such as interoffice mileage on DS1 Capable loops, DID charges and DID trunks.
- c. Qwest makes the bill difficult to audit as certain USOCs have multiple rates. For example, although zone prices vary, only one USOC is used on the bill for various rates. Also, Qwest bills DS1 ITPs using two different USOCs but the rate is the same. This is a new development as each rate used to have a specific USOC on the UNE loop bills. It appears this happened when Qwest implemented some of the cost docket rates.

### **2. UNE Loop Bills - Non-Recurring Charges (soactvty.det file)**

Overcharged %: 54.0%

Issues:

- a. Qwest gave Eschelon prorated credits back to 6/5/02 for the cost docket rate change on the DS1 capable loops that are billed on this invoice. However, it did not give Eschelon any prorated credits back to 6/5/02 for any other unbundled loop rate element. Qwest owes Eschelon prorated credits back to 6/5/02 for all rates that changed pursuant to the cost docket effective back to 6/5/02.
- b. Qwest bills multiple rates for the same USOCs with some NRCs being charged the old rate and some being charged the new cost docket rate.
- c. Qwest billed all coordinated w/o cooperative testing installation charges as "first line" which carries a higher price. Eschelon's average customer size is 4 lines so the first line should have charged \$59.81 and the additional 3 lines billed \$53.32. Qwest billed all lines with USOC 1CRUF as \$59.81.
- d. Qwest is not billing the Maintenance, Repair, Testing and dispatch charges that were ordered by the Commission in the cost docket.